

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALBERT TRAPAGA, PRO SE, )  
Petitioner, )  
vs. )  
BRUCE CHADBOURNE, in his )  
capacity as field Office )  
Director of Detention for )  
Removal of Detainees, )  
Defendants., ET AL. )

FILED  
CLERKS OFFICE  
2005 FEB -1 P 2:34  
CIVIL ACTION OF MASS  
NO. 1:04-cv-12599  
**PETITIONER'S MOTION FOR THE  
APPOINTMENT OF COUNSEL**

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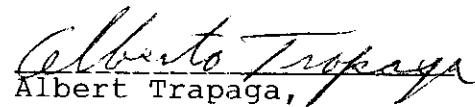
NOW COMES the above petitioner, Alberto Trapaga, and hereby files his self-prepared Motion Requesting the Appointment of Counsel in the above-entitled matter.

As grounds for such motion, petitioner states that;

(a) he is indigent, and can only pay the cost of the \$5.00 filing fee, and (b) that he is not schooled in law and his action desperately needs the full attention of experienced counsel, and (c) that the issues around deportation and immigration are very complex, and it would be a waste of valuable resources for the court to force him to act on his own in such an important matter and, (d) he is an illegal Alien which makes the action more complex. Finally, the appointment of counsel would be cost effective to both the court and the United States.

WHEREFORE, petitioner prays that this Honorable Court will grant his motion for all stated herein.

Respectfully submitted,

  
Albert Trapaga,  
Mass Treatment Center  
30 Administration Road  
Bridgewater, MA 02324-3230  
Petitioner, Pro Se

Dated: January 17, 2005